

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 28, 2012

**Advice 3304-G/4052-E,  
Supplemental Advice Letters  
3304-G-A/4052-E-A, and  
3304-G-B/4052-E-B**

Brian K. Cherry  
Vice President, Regulation and Rates  
Pacific Gas & Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: Revised Customer Energy Statement (RCES) Formats in Compliance with  
Decision 12-03-015**

Dear Mr. Cherry:

PG&E Advice Letter 3304-G/4052-E, and Supplemental Advice Letters 3304-G-A/4052-E-A, and 3304-G-B/4052-E-B are approved and effective August 30, 2012. The Protest of DRA is dismissed on technical grounds in accordance with General Order 96-B, Section 7.6.1.

PG&E filed PG&E Advice Letter 3304-G/4052-E on June 1, 2012. The advice letter was protested by DRA on June 20, 2012. PG&E filed a reply to the protest on June 28, 2012. On June 30, 2012, the Energy Division suspended PG&E Advice Letter 3304-G/4052-E to allow further review. Subsequently, PG&E agreed in writing to extend the suspension period until December 30, 2012. PG&E filed Supplemental Advice Letters 3304-G-A/4052-E-A, and 3304-G-B/4052-E-B on November 30, 2012, and December 14, 2012 respectively.

### **Energy Division Requested Changes to the RCES**

PG&E and the Energy Division met and conferred over email and phone several times during the suspension period to discuss changes to the Revised Customer Energy Statement (RCES) requested by Energy Division. The two supplemental advice letters filed by PG&E address the issues of concern to the Energy Division. Details of the changes made in conformance with Energy Division review are found on pages 2-4 of Supplemental Advice Letter 3304-G-A/4052-E-A and on pages 1-2 of Supplemental Advice Letter 3304-G-B/4052-E-B.

**Additional PG&E Proposed Changes to the RCES**

PG&E made other changes to the RCES on its own initiative that Energy Division now approves. Details of these changes are found on pages 4-6 of Supplemental Advice Letter 3304-G-A/4052-E-A. The Energy Division approves these changes including:

Revised Energy Statement Format 18 for Direct Access (DA), Community Choice Aggregation (CCA) and gas Core Transport Agent (CTA) customers.

For DA, CCA and CTA Energy Statements, PG&E is proposing to revise the Details of Electric and Gas Delivery Charges to present the bill at the bundled delivery rate and explicitly subtract the electric generation or gas procurement charges (shown as a “generation credit” in the case of the electric bill) to arrive at the total PG&E delivery charges<sup>1</sup>. PG&E has affirmed that DA/CCA customers prefer this presentation through quantitative research<sup>2</sup>. PG&E believes this presentation makes clear that the customer is not being double-charged for electric generation or gas procurement by PG&E and his/her third-party supplier as the PG&E generation/gas procurement charge is identified as being subtracted out of the PG&E portion of the bill.

The revised Details of Electric Delivery Charges include the line items in the following sample:

07/01/2012 - 07/09/2012		Your Tier Usage	1	2	3	4
Tier 1 Allowance	99.00 kWh	(9 days x 11.0 kWh/day)				
Tier 1 Usage	99.000000 kWh	@	\$ 0.12845			\$ 12.72
Tier 2 Usage	29.700000 kWh	@	\$ 0.14602			4.34
Tier 3 Usage	69.300000 kWh	@	\$ 0.29561			20.49
Tier 4 Usage	213.750000 kWh	@	\$ 0.33561			71.74
Generation Credit						- 29.14
Power Charge Indifference Adjustment						2.71
Cost Responsibility Surcharge Exemption						0.00
Franchise Fee Surcharge						0.21
<b>Total Electric Delivery Charges</b>						<b>\$83.07</b>

2009 Vintaged Power Charge Indifference Adjustment

<sup>1</sup> The originally filed format used a delivery rate unbundled from electric generation or gas procurement. (PG&E Advice 3304-G/4052-E file June 1, 2012)

<sup>2</sup> See email dated September 27, 2012 from Sid Dietz of PG&E to CPUC Energy Division Director Ed Randolph stating that MEA had agreed to the new proposed bill presentment for CCA customers. See also email dated September 18, 2012 from Sid Dietz of PG&E to CPUC Energy Division Director Ed Randolph in which PG&E shared the quantitative research results comparing customer reaction to the two bill presentments. The research results confirm that CCA/DA customers prefer the bill format that shows the bundled delivery rate followed by a line item generation credit.

### Withdrawal of Format 9 for Low Vision Customers

PG&E wishes to withdraw format 9, which presented a Low Vision format that excludes certain information in order to present more information in large font. The Low Vision format would have been available for customers on E1 and/or G1 rate schedules. Only low vision customers on other rate schedules or enrolled in payment programs such as Balanced Payment Plans would have received enlarged copies of their full energy statements<sup>3</sup>. After discussion with the Center for Accessible Technology, PG&E has agreed that all customers requesting Low Vision format will receive enlarged copies of their full energy statements<sup>4</sup>.

### **Protest of DRA**

In DRA's protest to Advice Letter 3304-G/4052-E, DRA argues that PG&E should display the actual CARE gas and electric rates in the Details of Charges sections of the energy statements sent to CARE customers rather than PG&E's proposal to display the non-CARE gas and electric rates and the CARE discount as line item discounts to bill calculation in the Details of Charges.

DRA asserts that PG&E's proposed presentation of the non-CARE rate in the Details of Charges "makes it significantly more difficult for low-income and price sensitive customers to determine their per-unit charges, and thus use their bills as a meaningful tool to control energy costs." (Protest page 1) DRA argues that PG&E's bill format "will be misleading and unnecessarily alarming for low-income customers." (Protest page 2)

### **Reply of PG&E**

In their reply to DRA's protest PG&E notes that the actual per-unit CARE rates are displayed in the bill message section directly to the right of the Details of Charges making it possible for the customer to compare the CARE and non-CARE rates. In addition the RCES provides customers with a graph of their daily usage during the billing period, and a visual representation of their tier as well as a definition of the Tier 1 (baseline) allowance. Therefore, PG&E believes the combination of the CARE-specific presentment and other general improvements to all RCES formats support the ability of residential CARE customers to control their energy costs. PG&E also cites customer research it conducted on the presentment of CARE energy statements with CARE customers to support its design of the RCES and states that DRA has not offered customer research or survey data to support its position. (Reply page 2)

---

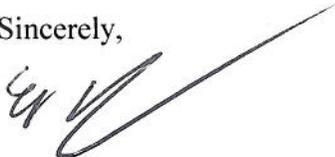
<sup>3</sup> See footnote 2 on page 3 of the original Advice Letter.

<sup>4</sup> PG&E performed customer research on the standard and Low Vision energy statements with low vision customers in January 2012. The research found that both more moderately and extremely impaired respondents prefer the standard prototype bill to the low-vision version.

**Energy Division Disposition of the Protest**

The Energy Division finds that customers would be better served by the CARE presentment proposed by PG&E rather than the format favored by DRA. The PG&E format better informs CARE customers by enabling them to understand what their actual per-unit CARE rate is, what CARE discount they receive, and what the non-CARE rate would be if they were not in the CARE program. An additional benefit of showing the non-CARE rate is that customers can easily see the consequence of failing to renew their CARE status by the date shown above the bill calculation—both in terms of the discount amount that would be lost and the higher non-CARE rates that would apply. This is particularly true for CARE customers whose electric Tier 4 usage is being billed at a Tier 3 CARE rate. DRA's proposed presentation would not provide CARE customers in Tier 4 with the Tier 4 usage needed to calculate their savings. Therefore, presenting the non-CARE rate is neither "irrelevant" nor misleading as DRA asserts. (Protest page 1, and 2) The protest of DRA is dismissed on technical grounds.

Sincerely,

A handwritten signature in black ink, appearing to read 'ER', with a long, sweeping horizontal stroke extending to the right.

Edward Randolph  
Director, Energy Division  
California Public Utilities Commission



**Brian K. Cherry**  
Vice President  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.7226

December 14, 2012

**Advice 3304-G-B/4052-E-B**

(Pacific Gas and Electric Company ID U 39 /M)

Public Utilities Commission of the State of California

**Subject: Supplemental: Revised Customer Energy Statement (RCES) Formats  
in Compliance with Decision 12-03-015**

This supplemental advice letter is being submitted to clarify and expand on Advice 3304-G-A/4052-E-A which Pacific Gas and Electric Company (PG&E) submitted on November 30, 2012. While revised Attachment 1 filed in Advice 3304-G-A/4052-E-A and Attachment 4 filed in Advice 3304-G/4052-E are not being replaced, the production of Energy Statements presented therein will conform to the changes described below.

**Purpose**

On November 30, 2012, PG&E filed a supplemental Advice Letter 3304-G-A/4052-E-A to supplement original Advice Letter 3304-G/4052-E, filed on June 1, 2012. PG&E filed for approval of its revised customer energy statement forms in accordance with Ordering Paragraph (OP) 5 of Decision (D.) 12-03-015 Phase 3 of General Rate Case (GRC) A.10-03-014. The Advice Letter also followed the guidance provided by the California Public Utilities Commission (CPUC or Commission) in OP 10 of D.07-07-047.

This supplemental advice letter is being submitted to clarify and expand on the prior Supplemental Advice Letter 3304-G-A/4052-E-A in conformance with the review by the Energy Division of the CPUC.

**Bill Messages**

**California Alternative Rates for Energy (CARE) Rates**

PG&E wishes to clarify that the CARE Rates message will be the first message displayed every month if there is more than one message on Page 3 & 4 of the CARE Format (See Format 2). The CARE Rates message will be located on the right hand side of the page above any other bill messages which may appear under "Additional Messages".

### **Non-residential Time-of-Use (TOU)**

PG&E will implement a new bill message for non-residential customers on TOU schedules. The message will be displayed at least annually. The message will state:

- The customer is on a TOU rate schedule,
- The TOU rate charges a higher rate for electric usage on summer weekday afternoons,
- To save money, conserve energy as much as possible during those summer peak hours.

As shown in Attachment 4, the TOU periods are presented every month in the lower right hand corner of the Details of Electric Charges page.

### **Graphics**

PG&E will endeavor to enlarge the font sizes in the graphs to improve readability to the extent possible within the same footprint. (See the sample graphs in revised Attachment 1 filed in Advice 3304-G-A/4052-E-A on November 30, 2012). The changes to the font size and readability of the graphs on all pages in Attachment 1 will apply to all energy statement formats, including all residential and commercial formats.

### **48 Hour Notice Envelopes**

PG&E will pilot using different envelopes for 48 hour notices than are used for other correspondence. PG&E will monitor customer response to this new process.

### **Protests**

Pursuant to General Order 96-B, Section 7.5.1, due to the limited nature of this Supplemental Advice Letter, PG&E is requesting the protest period not be reopened by the filing of this supplement.

### **Effective Date**

PG&E requests that this supplemental Advice Letter 3304-G-B/4052-E-B be approved concurrent with approval of the original Advice Letter 3304-G/4052-E, and Supplemental Advice Letter 3304-G-A/4052-E-A, as supplemented herein, effective on **August 30, 2012**.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this supplemental advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.10-03-014 and A.06-06-026. Address changes to the General Order 96-B service list should be directed to PG&E at email address

PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>

A handwritten signature in black ink, appearing to read "Paul Cheng". The signature is written in a cursive style and is positioned above the typed name.

Vice President, Regulatory Relations

cc: Service List A.10-03-014  
Service List A.06-06-026  
Melissa Kasnitz, Center for Accessible Technology  
Lee Whei Tan, Division of Ratepayer Advocates  
Stephanie Chen, The Greenlining Institute  
Matthew Freedman, The Utility Reform Network  
Elizabeth Rasmussen, Marin Energy Authority

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Kimberly Chang

Phone #: (415) 972-5472

E-mail: kwcc@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3304-G-B/4052-E-B**

Tier: **2**

Subject of AL: **Supplemental: Revised Customer Energy Statement (RCES) Formats in Compliance with Decision 12-03-015**

Keywords (choose from CPUC listing): Compliance, Bilingual, Forms, Rules

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-03-015

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: \_\_\_\_\_

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

Confidential information will be made available to those who have executed a nondisclosure agreement:  Yes  No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: **August 30, 2012**

No. of tariff sheets: 0

**Concurrent with Advice 3304-G/4052-E and  
Advice 3304-G-A/4052-E-A**

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**California Public Utilities Commission**

**Energy Division**

**EDTariffUnit**

**505 Van Ness Ave., 4<sup>th</sup> Flr.**

**San Francisco, CA 94102**

**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**

**Attn: Brian Cherry**

**Vice President, Regulation and Rates**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: PGETariffs@pge.com**

**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

1st Light Energy	Department of General Services	Norris & Wong Associates
AT&T	Department of Water Resources	North America Power Partners
Alcantar & Kahl LLP	Dept of General Services	North Coast SolarResources
Ameresco	Douglass & Liddell	Occidental Energy Marketing, Inc.
Anderson & Poole	Downey & Brand	OnGrid Solar
BART	Duke Energy	PG&E
Barkovich & Yap, Inc.	Economic Sciences Corporation	Praxair
Bartle Wells Associates	Ellison Schneider & Harris LLP	R. W. Beck & Associates
Bloomberg	Foster Farms	RCS, Inc.
Bloomberg New Energy Finance	G. A. Krause & Assoc.	SCD Energy Solutions
Boston Properties	GLJ Publications	SCE
Braun Blaising McLaughlin, P.C.	GenOn Energy Inc.	SMUD
Brookfield Renewable Power	GenOn Energy, Inc.	SPURR
CA Bldg Industry Association	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
CLECA Law Office	Green Power Institute	Seattle City Light
California Cotton Ginners & Growers Assn	Hanna & Morton	Sempra Utilities
California Energy Commission	Hitachi	Sierra Pacific Power Company
California League of Food Processors	In House Energy	Silicon Valley Power
California Public Utilities Commission	International Power Technology	Silo Energy LLC
Calpine	Intestate Gas Services, Inc.	Southern California Edison Company
Casner, Steve	Lawrence Berkeley National Lab	Spark Energy, L.P.
Cenergy Power	Los Angeles County Office of Education	Sun Light & Power
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sunrun Inc.
Chris, King	MAC Lighting Consulting	Sunshine Design
City of Palo Alto	MRW & Associates	Sutherland, Asbill & Brennan
City of Palo Alto Utilities	Manatt Phelps Phillips	Tecogen, Inc.
City of San Jose	Marin Energy Authority	Tiger Natural Gas, Inc.
City of Santa Rosa	McKenna Long & Aldridge LLP	TransCanada
Clean Energy Fuels	McKenzie & Associates	Turlock Irrigation District
Clean Power	Merced Irrigation District	United Cogen
Coast Economic Consulting	Modesto Irrigation District	Utility Cost Management
Commercial Energy	Morgan Stanley	Utility Specialists
Consumer Federation of California	Morrison & Foerster	Verizon
Crossborder Energy	Morrison & Foerster LLP	Wellhead Electric Company
Davis Wright Tremaine LLP	NLine Energy, Inc.	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	NRG West	eMeter Corporation
Defense Energy Support Center	NaturEner	